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## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA FT. LAUDERDALE DIVISION

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CLARENCE MADDOX CLERK, USDC/SDFL/FTL

CHERL SEARS,

Plaintiff,

CASE NO. 00-6017-CIV-DIMITRIOULEAS

VS.

THE SCHOOL BOARD OF BROWARD COUNTY, FLORIDA Defendant.

## PLAINTIFF'S MOTION FOR ENLARGEMENT OF TIME FOR THE FILING OF A JOINT SCHEDULING REPORT AND JOINT SCHEDULING ORDER

Plaintiff, Cherl Sears, by her undersigned counsel and pursuant to Rule 6(b), Fed. R. Civ. P. and Rule 7.1 of the Local Rules of the United States District Court for the Southern District of Florida, hereby files this Motion For Enlargement Of Time To File A Joint Scheduling Report and Joint Scheduling Order. In support of this Motion, the Plaintiff states as follows:

- 1. According to the Court's order dated March 7, 2000, the parties were directed to file a Joint Scheduling Report and Joint Scheduling Order on or before April 5, 2000.
- 2. Undersigned counsel sent to counsel for the Defendant, by facsimile, proposed drafts of a Joint Scheduling Report and Joint Scheduling Order.
- 3. It is anticipated that counsel for the parties will need a brief extension of time in which to make final additions and corrections to the Joint Scheduling Report and Joint Scheduling Order.



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- On April 3, 2000, undersigned counsel telephoned the office of defense counsel, 4. Gordon Rogers, in an effort to discuss the Defendant's position on this Motion. However, undersigned counsel was unable to reach Mr. Rogers.
- 5. Therefore, the Plaintiff is requesting additional time to allow counsel to finalize the language of the Joint Scheduling Report and Joint Scheduling Order.
- 6. Undersigned counsel respectfully requests that the parties be permitted to file the Joint Scheduling Report and Joint Scheduling Order on or before April 10, 2000.

WHEREFORE, the Plaintiff respectfully requests that the Court grant the Motion For Enlargement of Time For the Filing Of A Joint Scheduling Report and Joint Scheduling Order.

Respectfully submitted,

Mark J. Berkowitz, P.A. 524 S. Andrews Avenue Suite 200N Ft. Lauderdale, Florida 33301 (954) 527-0570 Telephone (954) 463-5428 Telecopier

Fla. Bar No. 369391

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was sent by regular mail on this day of April, 2000, to Gordon Rogers, Esq., Muller, Mintz, et al, First Union Financial Center, 200 S. Biscayne Blvd., Suite 3600, Miami, Florida 33131.

Mark J. Berkovitz

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